

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

**JUVENTINO AYALA and TAMY CHAPA**

**PLAINTIFFS**

vs.

No. 2:21-cv-253

**4600 OCEAN DRIVE CONDOMINIUM ASSOCIATION**

**DEFENDANT**

**MOTION TO WITHDRAW AS COUNSEL**  
**FOR PLAINTIFF TAMY CHAPA**

Colby Qualls, Josh Sanford and Sanford Law Firm, PLLC, for their Motion to Withdraw as Counsel for Plaintiff Tamy Chapa do state as follows:

1. Undersigned counsel currently serve as attorneys for Plaintiffs for Plaintiffs' wage and hour case.
2. There has been a breakdown of the professional relationship between undersigned counsel and Plaintiff Tamy Chapa.
3. Accordingly, undersigned counsel seek to withdraw as attorneys for Plaintiff Tamy Chapa in this matter.
4. Undersigned counsel provided notice to Plaintiff Tamy Chapa of their intention to withdraw. The undersigned will serve a copy of this Motion via email attachment and via First Class U.S. Mail to Plaintiff Tamy Chapa's last known address.
5. Undersigned counsel request that Plaintiff Tamy Chapa be permitted a stay on all deadlines for forty-five days so she can obtain counsel.
6. Undersigned counsel have not been paid any monies by Plaintiff Tamy Chapa; they have been working on a contingency fee basis.
7. Plaintiff Tamy Chapa's last known address is as follows:

Ms. Tamy Chapa  
1303 Ayers Street  
Corpus Christi, TX 78404

8. Undersigned counsel have conferred with Defendant's counsel and have been authorized to state that this Motion is unopposed.

WHEREFORE, Colby Qualls, Josh Sanford, and Sanford Law Firm, PLLC, respectfully request that this Court grant their Motion to Withdraw

Respectfully submitted,

**SANFORD LAW FIRM, PLLC**  
**Attorneys for Plaintiffs**  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (800) 615-4946  
Facsimile: (888) 787-2040

/s/ Colby Qualls  
Colby Qualls  
Ark. Bar No. 2019246  
[colby@sanfordlawfirm.com](mailto:colby@sanfordlawfirm.com)

/s/ Josh Sanford  
Josh Sanford  
Tex. Bar No. 24077858  
[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, do hereby certify that on the 10th day of May, 2023, a true and correct copy of the foregoing MOTION was electronically filed via the CM/ECF system which will provide notice to the following attorneys of record, and that a true and correct copy of the foregoing MOTION was mailed to Plaintiff Tamy Chapa at her last known address, as well as emailed to her:

Tonya Beane Webber, Esq.  
PORTER, ROGERS, DAHLMAN & GORDON, P.C.  
800 N. Shoreline Blvd, Suite 800 South  
Corpus Christi, Texas 78401  
[twebber@prdgc.com](mailto:twebber@prdgc.com)

**Attorney for Defendant**

Ms. Tamy Chapa  
1303 Ayers Street  
Corpus Christi, TX 78404

**Plaintiff**

/s/ Colby Qualls  
**Colby Qualls**